

# LEE LITIGATION GROUP, PLLC

148 WEST 24TH STREET, 8TH FLOOR  
NEW YORK, NY 10011  
TEL: 212-465-1188  
FAX: 212-465-1181

INFO@LEELITIGATION.COM

WRITER'S DIRECT: (212) 465-1188  
cklee@leelitigation.com

December 14, 2023

## Via ECF

The Honorable Valerie Figueredo, U.S.M.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Hassan v. La Grenouille, Inc. et al.*  
Case No. 1:21-cv-10262 (JPC) (VF)

Dear Judge Figueredo:

We are counsel to Plaintiff and write, jointly with counsel to Defendants to respectfully request an adjournment of the final approval hearing date currently scheduled for March 1, 2024.

The adjournment is necessary to accommodate a revised Notice mailing and administration schedule. As the Court is aware, during the preliminary approval hearing on August 3, 2023 the parties advised the Court that Defendants were in default of their settlement funding obligations as Defendants' restaurant had to unexpectedly close for several months due to a plumbing issue. Based on the expected reopening date of Labor Day, and Defendants' expectation to be able to fund the settlement by mid-November, the parties requested a final approval hearing date several months away and had planned for the administrator to delay the Notice mailing to late November (after Defendants were expected to be able to fund). However, as Defendants were unable to get approval to reopen until early November, 2023, and as Defendants have been unable to fund the settlement to date, the Notice mailing has not yet been effectuated.

Defendants advise that they will be able to fund the settlement by January 7, 2024, and, as such, the parties request the final approval hearing date be adjourned to a date or after June 1, 2024. Such date provides sufficient time for the administrator to mail Notice following Defendants' funding, for class members to opt-out or object, and for Plaintiff to file a motion for final approval detailing the mailing results in advance of the final approval hearing.

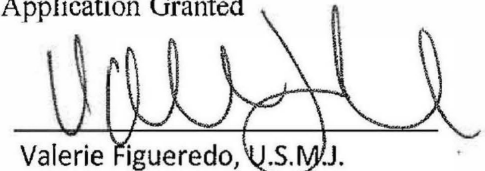
This is the first request for adjournment. The request is made jointly and all parties consent to the adjournment request. We thank You Honor for considering this matter.

Respectfully submitted,

/s/ C.K. Lee

cc: all parties via ECF

Application Granted



Valerie Figueredo, U.S.M.J.

DATED: December 15, 2023

The final approval hearing date currently scheduled for March 1, 2024 is **rescheduled for June 10, 2024 at 10:00 a.m.** All other information pertinent to the scheduling remains the same. See ECF No. 54. The Clerk of Court is directed to terminate the motion at ECF No. 55.